

# **EXHIBIT 3**

**Victoria Giese**

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**From:** Zachary Dolling <zachary@texascivilrightsproject.org>  
**Sent:** Monday, March 14, 2022 5:17 PM  
**To:** Eric Nichols  
**Cc:** Hani Mirza; mimi@texascivilrightsproject.org; schen@texascivilrightsproject.org; tbuser-clancy@aclutx.org; skuman@aclutx.org; aharris@aclutx.org; asecura@aclutx.org; Victoria Filoso; Sandy Myers; Karson Thompson  
**Subject:** Re: OCA-Greater Houston et al. v. Texas Secretary of State et al., 1:21-CV-0780-XR

Hi Eric,

Thanks for reaching out with the draft and for your patience. After internal consultation, however, we have decided not to agree to a stipulation.

Sincerely,

**Zachary Dolling**  
Texas Civil Rights Project  
Mobile: 512-496-4746

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On Sat, Mar 12, 2022 at 3:06 PM Eric Nichols <[Eric.Nichols@butlersnow.com](mailto:Eric.Nichols@butlersnow.com)> wrote:

Hani and Zach, attached is a draft non-participation/non-enforcement stipulation for the case. If your team would please review and let us know if this stipulation works we would appreciate it. The stipulation is based on the one we entered into for DA Ogg in the *Longoria* matter.

Our current response date for DA Ogg is Tuesday, so if you could let us know by COB Monday or early Tuesday we would appreciate it. I will be in the office on Monday if you want to discuss. Thanks.

Eric

**Eric J.R. Nichols**

**Butler Snow LLP**

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1400 Lavaca Street, Suite 1000, Austin, TX 78701

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**From:** Hani Mirza <[hani@texascivilrightsproject.org](mailto:hani@texascivilrightsproject.org)>

**Sent:** Monday, February 28, 2022 12:51 PM

**To:** Eric Nichols <[Eric.Nichols@butlersnow.com](mailto:Eric.Nichols@butlersnow.com)>; Zachary Dolling <[zachary@texascivilrightsproject.org](mailto:zachary@texascivilrightsproject.org)>

**Cc:** [mimi@texascivilrightsproject.org](mailto:mimi@texascivilrightsproject.org); [schen@texascivilrightsproject.org](mailto:schen@texascivilrightsproject.org); [tbuser-clancy@aclutx.org](mailto:tbuser-clancy@aclutx.org); [skuman@aclutx.org](mailto:skuman@aclutx.org); [aharris@aclutx.org](mailto:aharris@aclutx.org); [asegura@aclutx.org](mailto:asegura@aclutx.org); Victoria Filoso <[Victoria.Filoso@butlersnow.com](mailto:Victoria.Filoso@butlersnow.com)>; Sandy Myers <[Sandy.Myers@butlersnow.com](mailto:Sandy.Myers@butlersnow.com)>

**Subject:** Re: OCA-Greater Houston et al. v. Texas Secretary of State et al., 1:21-CV-0780-XR

Eric,

We are unopposed to the extension request. The best points of contact for the case are me ([hani@texascivilrightsproject.org](mailto:hani@texascivilrightsproject.org)), Zach Dolling ([zachary@texascivilrightsproject.org](mailto:zachary@texascivilrightsproject.org)), and Sarah Chen ([schen@texascivilrightsproject.org](mailto:schen@texascivilrightsproject.org)). Please include us in all future correspondence about the case.

Thank you,

Hani Mirza

On Sat, Feb 26, 2022 at 11:20 AM Eric Nichols <[Eric.Nichols@butlersnow.com](mailto:Eric.Nichols@butlersnow.com)> wrote:

Counsel:

We will be coming in to represent Harris County District Attorney Kim Ogg in her official capacity in this lawsuit.

We are filing on Monday a motion to extend the response or answer date for Defendant Ogg to March 15, 2022. Please let us know if plaintiffs are unopposed to the motion.

Also, please let us know who among you (or your other colleagues on the pleadings) is the best point of contact to discuss the case.

Thanks and have a good weekend.

Eric

**Eric J.R. Nichols**

**Butler Snow LLP**

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**Hani Mirza**

*Voting Rights Program Director*

Texas Civil Rights Project

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